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JAN 13 2006

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

DEMETRIUS BROWN,)	
Plaintiff,)	
)	
)	
v.)	C.A. No. 04-379 Erie
)	
U.S. JUSTICE DEPT. et. al.,)	
Defendants.)	

MOTION FOR EXTENSION OF TIME

COMES NOW, DEMETRIUS BROWN, herein as Plaintiff, proceeding Pro-Se, hereby moves this Honorable Court, the United States District Court for the Western District of Pennsylvania, Erie Division for Motion Extending Time to Respond to Defendants' Motion for Substitution of Party, Motion to Strike Demand for Trial by Jury, and Motion to Dismiss, or in the alternative, Motion for Summary Judgment. In support, Plaintiff affirms that;

1. The Defendants submitted said motions for electronic filing on January 3, 2006.

2. The Plaintiff did receive on January 9, 2006 service of said motions filed into court by Defendants.

3. The Plaintiff's time to reply is 20 days from service of said motions, that being January 23, 2006.

4. The Plaintiff is appearing in propria persona, without counsel.

5. The Defendants' motions are voluminous and time is needed to thoroughly look over and read.

6. The Defendants' motions are replete with case law which Plaintiff needing time to research.

7. The Plaintiff having the obligation to perform institutional work assignments daily from Sunday thru Thursday is precluded from making the hasty demands of replying to Defendants' motion as timely and should be given additional time to respond.

8. The Plaintiff having recently come to awareness, is aware that the Federal Correctional Institution RayBrook where Plaintiff is housed will be temporarily reducing Law Library hours from 10 hrs. to 4½ hrs. Monday thru Saturday, the week of January 9-12, 2006.

9. The Plaintiff's work schedule coupled with the Institution's temporary reduction in Law Library hours will only allow Plaintiff 2½ hours daily for researching, writing, and typing during the week of January 9-12, 2006.

10. Plaintiff, in light of the foregoing, is requesting the Court an additional 14 days from January 23, 2006 to February 6, 2006 in which to respond to Defendants' motions.

WHEREFOR, Plaintiff request the Court to Extend Time to Respond to Defendants' Motion for Substitution of Party, Motion to Strike Demand for Jury Trial, and Motion to Dismiss

or in the alternative Motion for Summary Judgment.

I, DEMETRIUS BROWN, hereby affirm and declare under penalty of perjury, 28 U.S.C. §1746, that the foregoing is true and correct.

1-10-06
Dated

Demetrius Brown

cc:file
db/db
Megan E. Farrell

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

DEMETRIUS BROWN,)	
Plaintiff,)	
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v.)	C.A. No. 04-379 Erie
)	
U.S. JUSTICE DEPT. et. al.,)	
Defendants.)	

PROOF OF SERVICE

I, DEMETRIUS BROWN, do swear or declare that on this date, January 10th 2006, as required by Fed.R.Civ.P. 4, I have served the enclosed MOTION FOR EXTENSION OF TIME on each party to the above proceeding or that of party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in FCI RayBrook's internal mail system for mail in the United States, mail properly addressed to each of them and with first-class postage prepaid.

The names and addresses of those served are as follows:

MEGAN E. FARRELL	at	700 Grant St. Suite 4000
Assistant U.S. Attorney		Pittsburgh, PA. 15219
Western District of PA		(412) 894-7429
		PA ID #76972

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 10th, 2006

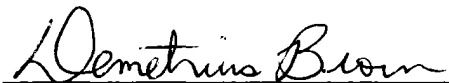
Demetrius Brown

1/10/06

Dear Clerk of Court:

Enclosed you will find one (1) original copy of a Motion to Extend Time. Please file with the Court accordingly. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Demetrius Brown". The signature is written in dark ink and is positioned above a horizontal line.

Demetrius Brown
Reg. No. 21534-039
FCI RayBrook
P.O. Box 9001
RayBrook, NY. 12977

cc:file
db/db